

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

DEC 12 2017

UNITED STATES OF AMERICA,)
vs.)
Plaintiff,)
vs.)
GABRIELLE A. JEFFRIES and)
CASSAUNDRA D. JACKSON,)
Defendants.)

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

No. 17-30207-DRH

Title 21, United States Code,
Section 843(a)(3)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

**Acquiring or Obtaining a Controlled Substance by Misrepresentation,
Fraud, Forgery, Deception or Subterfuge, 21 U.S.C. § 843(a)(3)
December 8 and 9, 2014 - Walgreens, Collinsville**

On or about December 8 and 9, 2014, in Madison County, within the Southern District of Illinois,

GABRIELLE A. JEFFRIES and CASSAUNDRA D. JACKSON,

defendants, acting together, knowingly and intentionally acquired and obtained a controlled substance by misrepresentation, fraud, forgery, deception and subterfuge from a pharmacy. The Defendants illegally obtained Phenergan with Codeine, a Schedule V controlled substance, through the use of a forged prescription from a pharmacy at Walgreens in Collinsville, in violation of Title 21, United States Code, Sections 843(a)(3) and Title 18, United States Code, Section 2.

COUNT 2

**Acquiring or Obtaining a Controlled Substance by Misrepresentation,
Fraud, Forgery, Deception or Subterfuge, 21 U.S.C. § 843(a)(3)**
December 8, 2014 - CVS, O'Fallon

On or about December 8, 2014, in Saint Clair County, within the Southern District of Illinois,

GABRIELLE A. JEFFRIES,

defendant, knowingly and intentionally acquired and obtained a controlled substance by misrepresentation, fraud, forgery, deception and subterfuge from a pharmacy. The Defendant illegally obtained Phenergan with Codeine, a Schedule V controlled substance, through the use of a forged prescription from a pharmacy at CVS in O'Fallon, in violation of Title 21, United States Code, Sections 843(a)(3).

COUNT 3

**Attempting to Acquire or Obtain a Controlled Substance by Misrepresentation,
Fraud, Forgery, Deception or Subterfuge, 21 U.S.C. § 843(a)(3)**
December 8, 2014 - Walgreens, Shiloh

On or about December 8, 2014, in Saint Clair County, within the Southern District of Illinois,

GABRIELLE A. JEFFRIES,

defendant, knowingly and intentionally attempted to obtain and acquire a controlled substance by misrepresentation, fraud, forgery, deception and subterfuge. The Defendant attempted to illegally obtain Roxicodone, a Schedule II controlled substance, by tendering a forged prescription to a pharmacy at Walgreens in Shiloh, in violation of Title 21, United States Code, Section 843(a)(3) and Title 18, United States Code, Section 2.

COUNT 4

**Acquiring or Obtaining a Controlled Substance by Misrepresentation,
Fraud, Forgery, Deception or Subterfuge, 21 U.S.C. § 843(a)(3)**
December 9, 2014 - CVS, Alton

On or about December 9, 2014, in Madison County, within the Southern District of Illinois,

CASSAUNDRA D. JACKSON,

defendant, knowingly and intentionally acquired and obtained a controlled substance by misrepresentation, fraud, forgery, deception and subterfuge from a pharmacy. The Defendant illegally obtained Phenergan with Codeine, a Schedule V controlled substance, through the use of a forged prescription from a pharmacy at CVS in Alton, in violation of Title 21, United States Code, Sections 843(a)(3).

COUNT 5

**Acquiring or Obtaining a Controlled Substance by Misrepresentation,
Fraud, Forgery, Deception or Subterfuge, 21 U.S.C. § 843(a)(3)**
December 9, 2014 - Walgreens, Alton

On or about December 9, 2014, in Madison County, within the Southern District of Illinois,

CASSAUNDRA D. JACKSON,

defendant, knowingly and intentionally acquired and obtained a controlled substance by misrepresentation, fraud, forgery, deception and subterfuge from a pharmacy. The Defendant illegally obtained Phenergan with Codeine, a Schedule V controlled substance, through the use of a forged prescription from a pharmacy at Walgreens in Alton, in violation of Title 21, United States Code, Sections 843(a)(3).

COUNT 6

**Acquiring or Obtaining a Controlled Substance by Misrepresentation,
Fraud, Forgery, Deception or Subterfuge, 21 U.S.C. § 843(a)(3)
December 9, 2014 - CVS, Alton**

On or about December 9, 2014, in Madison County, within the Southern District of Illinois,

CASSAUNDRA D. JACKSON,

defendant, knowingly and intentionally acquired and obtained a controlled substance by misrepresentation, fraud, forgery, deception and subterfuge from a pharmacy. The Defendant illegally obtained Phenergan with Codeine, a Schedule V controlled substance, through the use of a forged prescription from a pharmacy at CVS in Alton, in violation of Title 21, United States Code, Sections 843(a)(3).

COUNT 7

**Acquiring or Obtaining a Controlled Substance by Misrepresentation,
Fraud, Forgery, Deception or Subterfuge, 21 U.S.C. § 843(a)(3)
December 9, 2014 – Walgreens, Alton**

On or about December 9, 2014, in Madison County, within the Southern District of Illinois,

CASSAUNDRA D. JACKSON,

defendant, knowingly and intentionally acquired and obtained a controlled substance by misrepresentation, fraud, forgery, deception and subterfuge from a pharmacy. The Defendant illegally obtained Alprazolam, a Schedule IV controlled substance, through the use of a forged prescription from a pharmacy at Walgreens in Alton, in violation of Title 21, United States Code, Sections 843(a)(3).

COUNT 8

**Acquiring or Obtaining a Controlled Substance by Misrepresentation,
Fraud, Forgery, Deception or Subterfuge, 21 U.S.C. § 843(a)(3)
December 9, 2014 – Walgreens, Collinsville**

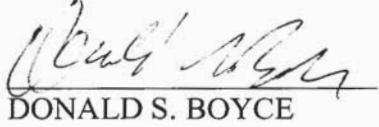
On or about December 9, 2014, in Madison County, within the Southern District of Illinois,

CASSAUNDRA D. JACKSON,

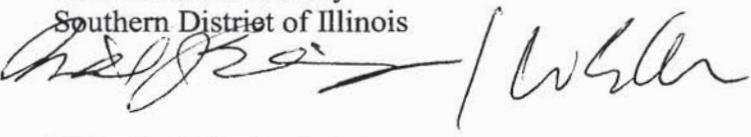
defendant, knowingly and intentionally acquired and obtained a controlled substance by misrepresentation, fraud, forgery, deception and subterfuge from a pharmacy. The Defendant illegally obtained Alprazolam, a Schedule IV controlled substance, through the use of a forged prescription from a pharmacy at Walgreens in Collinsville, in violation of Title 21, United States Code, Sections 843(a)(3).

A TRUE BILL

FOREPERSON


DONALD S. BOYCE

United States Attorney
Southern District of Illinois


MICHAEL J. QUINLEY
WILLIAM E. COONAN
Assistant United States Attorneys

Recommended Bond: \$10,000 secured